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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION,

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Documents Relates To:  
 ALL ACTIONS

**DECLARATION OF EMILIO E.  
 VARANINI IN SUPPORT OF THE  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL**

1. I am a Deputy Attorney General with the California Attorney General's Office and am lead counsel for the California Attorney General in the state court case of *State of California et. al. v. Samsung SDI, Co., Ltd.*, Case No. 11-51584 (California Superior Court, San Francisco). This case has been coordinated with this Court's MDL No. 1917 for purposes of fact and expert discovery as well as mediation and settlement. I am admitted to this Court and could, if called as a witness, testify competently to the matters set forth herein. I make this declaration under penalty of perjury under the laws of the United States and the State of California.

2. Portions of the Administrative Motion for Order Issuing the Letters of Request for the Taking of Evidence from Woong Tae (W.T.) Kim and Myung Joon (M.J.) Kim and of the Declaration of Emilio E. Varanini in Support of that Motion, as well the entirety of the two Letters of Request itself (including the Korean translations of those letters) refer to confidential information received from Defendant LG pursuant to a settlement agreement that it has with the Attorney General, including the personal address of two witnesses from whom the Attorney General seeks the taking of evidence.

3. Specifically, pages 2:21-25, 3:1-2, and 3:14-25, of the Declaration of Emilio E. Varanini in support of that motion and the Letters of Request, all contain this confidential information. This confidential information has been submitted in support of a non-dispositive motion.

4. The references to confidential information provided to the Attorney General by Defendant LG, such as the personal address of the witnesses from whom the Attorney General seeks the taking of evidence, concern information provided to the Attorney General pursuant to the settlement agreement entered into between those two parties.

5. While only portions of the motion and declaration referenced above were filed under seal, the Attorney General has filed under seal the Letters of Request and their Korean translations. The Attorney General believes that it is not practical for only portions of these documents to be filed under seal given the extensive reference to confidential information throughout the entirety of these documents.

Dated: May 12, 2014

Respectfully Submitted,

KAMALA D. HARRIS  
Attorney General of California

*s/Emilio E. Varanini*  
EMILIO E. VARANINI  
Deputy Attorney General  
*Attorneys for Plaintiffs*